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again the fourth month. He continued to pay \$6 interest each month. In less than two years plaintiff had paid \$115.50 for the use of \$25. Action was brought by the loan company, and he was pestered by demands. He was lowered in his employment from railroad yardmaster to helper. Plaintiff sued for malicious prosecution. The jury awarded him \$1,000 as actual damages, which the Kansas Supreme Court reduced to \$448, and an award of \$5,000 punitive damages was upheld by the court as not excessive. The court said that such damages were allowable, not because of any special merit in the plaintiff's case, but by way of punishment for malicious, vindictive, or a willful and wanton invasion of plaintiff's rights; the purpose being to restrain him and deter others from the commission of like wrongs.

Untruthful Antenuptial Protestations of Love Not Ground for Annulment of Marriage.—Love and especially avowals of love are usually matters of confidence except to those beneficially involved. Often it may be evidenced by facial expressions or by disregard of rain or cold, but, even so, courts will not recognize untruthful protestations of it as a matter of which they are to take cognizance. In the case of *Schaeffer v. Schaeffer*, 144 New York Supplement Reporter, 774, the court dismissed a complaint for an annulment of marriage. From the complaint it appears that the complainant met the young man at a dance. He called at her home about twice a week and they went out for walks and strolls. The young man insisted upon their marriage, and said that he had fallen in love with her at first sight. After about two months they were married, and later he told her that he did not love her, never did love her, never intended to love her, and insisted that she should get a divorce from him. The court says: "The case is a cruel one on its face; in fact, cruel enough to tempt a disturbance of the judgment of those who are fathers of daughters. But I think we have not yet arrived at a legal stage which requires an annulment of a marriage because one party or both parties were untruthful to each other in their mutual protestations of all-consuming and undying love. Marriage is yet a status on which depends the idea of a family, and on which, in turn, has arisen the structure of civilization as we know it."